



CalRecycle Stakeholder Workshop, July 20, 2010

HOME-GENERATED PHARMACEUTICAL PROGRAMS IN CALIFORNIA

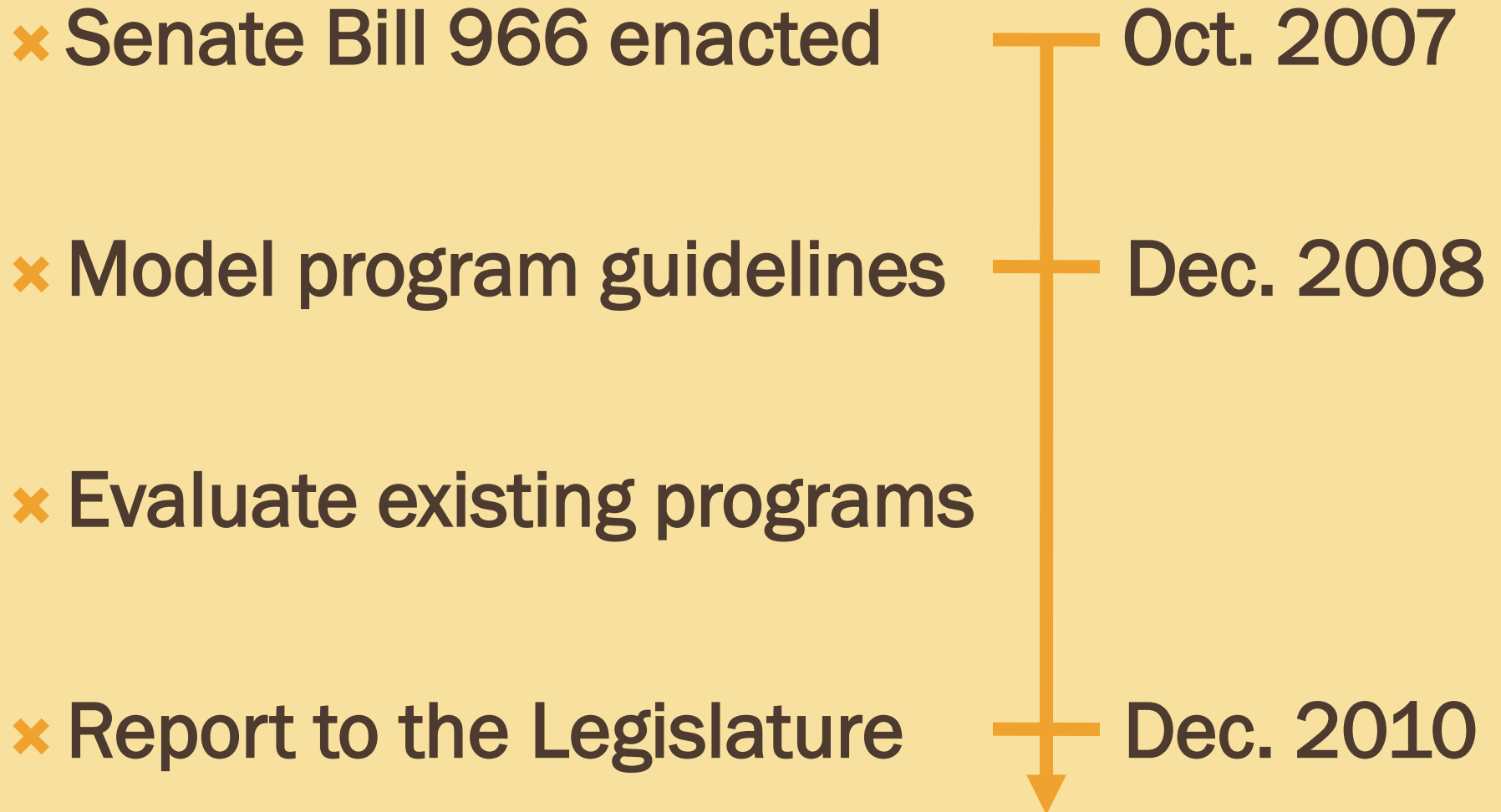
KEY POINTS

- ✗ Mounting concern over pharmaceutical waste disposal
 - + Each program type has merits
 - + Snapshot
 - + Your input

OVERVIEW

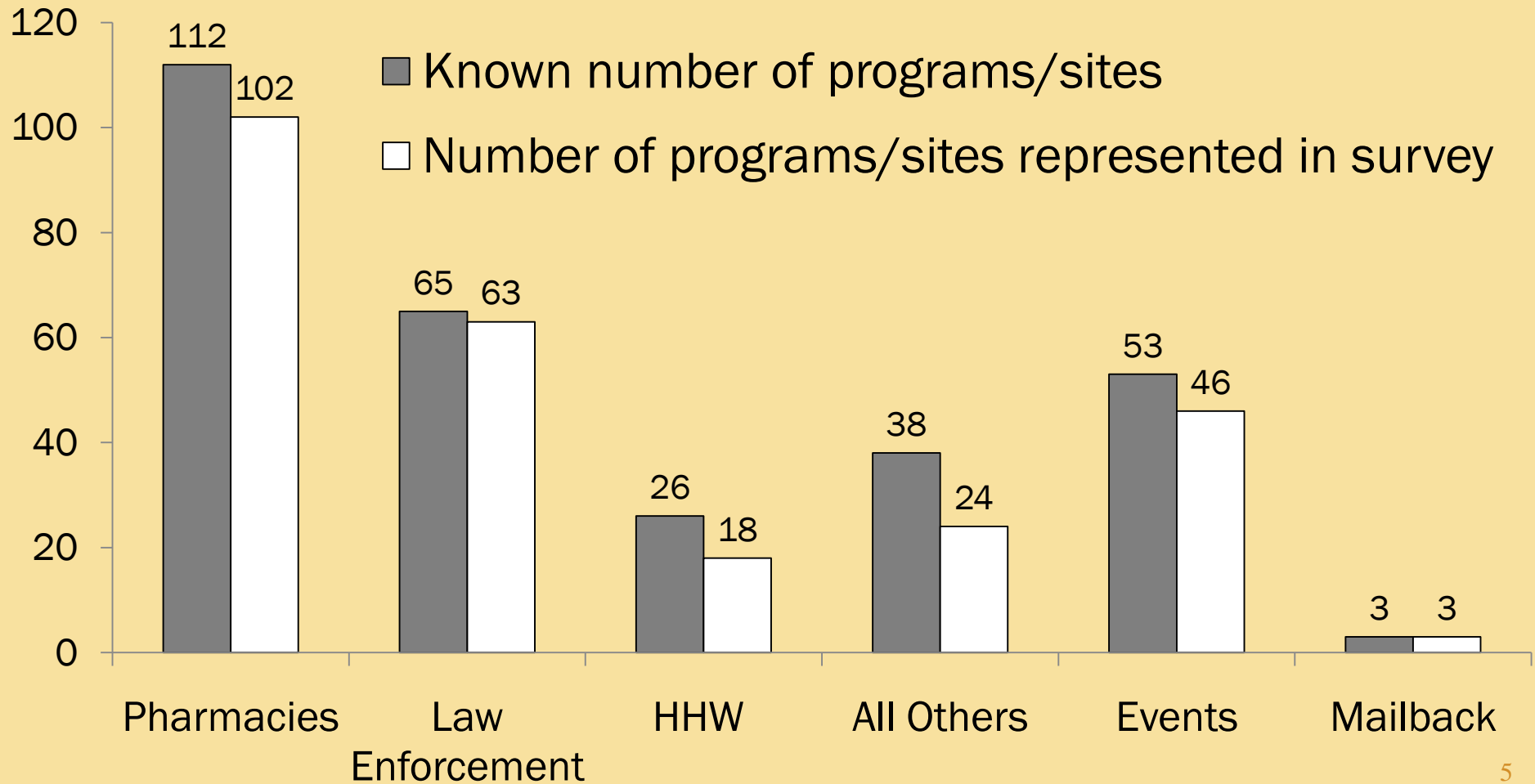
- ✗ Evaluation of Survey Results
- ✗ Challenges and Barriers
- ✗ Other Programs
- ✗ Options

SENATE BILL 966 REQUIREMENTS



SURVEYS

✕ High Response Rate



MODEL PROGRAM GUIDELINES

✗ SB 966 Required:

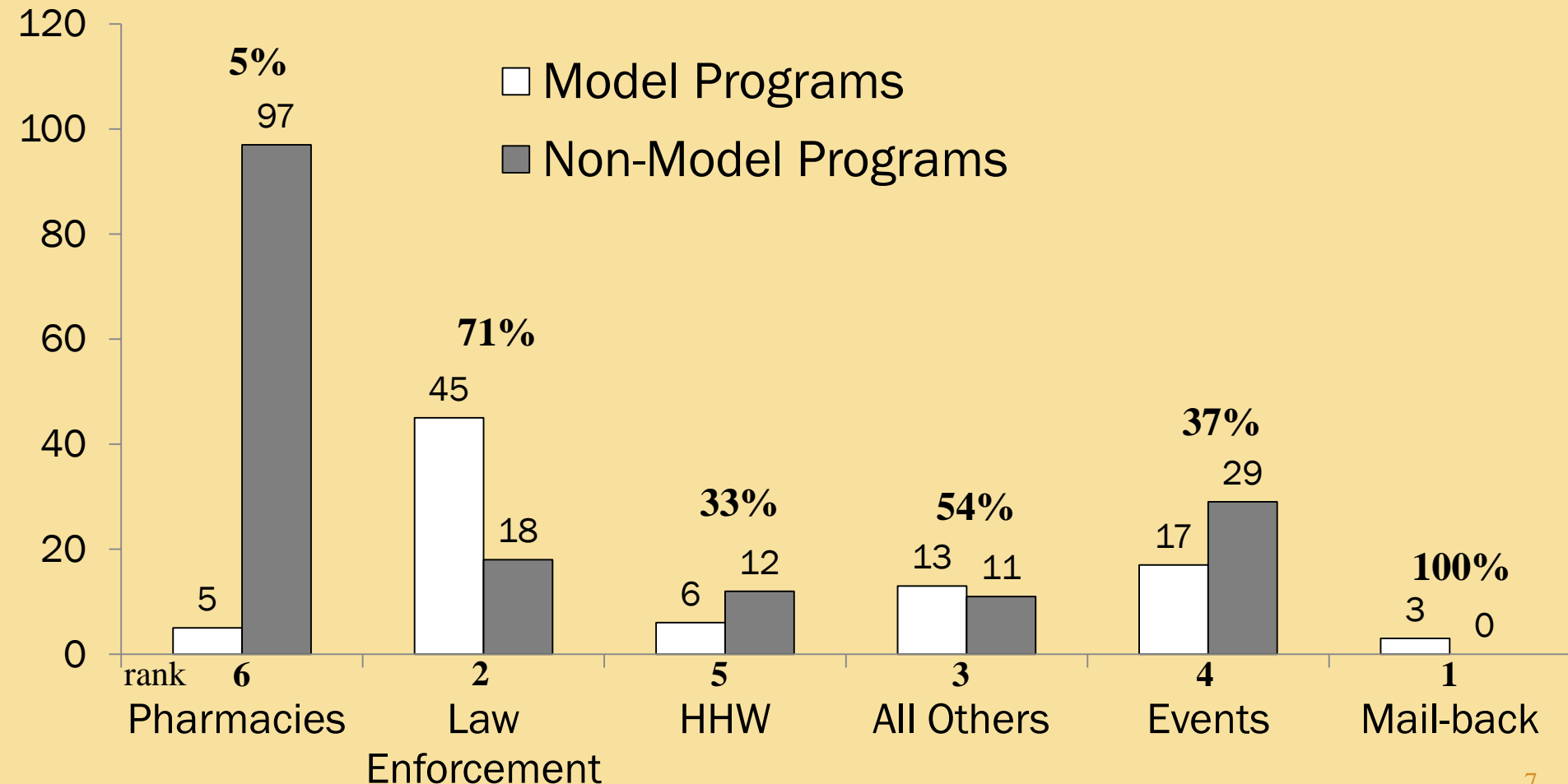
- + No cost
- + Protect environment
- + Health and safety

✗ Security (no illegal diversion):

- + Responsibility: Who/How Much (e.g., logs)
- + Who Has Access When (e.g., secure bins)

MODEL PROGRAMS

✕ Number of Model/Non-Model Programs by Type



EVALUATION CRITERIA

- ✗ Safety
- ✗ Accessibility
- ✗ Cost Effectiveness
- ✗ Efficacy

EVALUATION CRITERIA

- ✗ Safety
- ✗ Accessibility
- ✗ Cost Effectiveness
- ✗ Efficacy

EVALUATION – SAFETY (PHARMACIES)

✕ % of Non-Model Pharmacies per Criterion

Responsibility: Who/How Much

CDPH-registered hauler?

11%

Log accompanies controlled substances?

2%

Maintaining a log?

51%

Permission to store longer than 90 days?

25%

Who Has Access When

Participants access to drugs?

Secure drug waste container?

32%

Only police collect controlled substances?

2%

Bin is not publicly accessible?

65%

Lock bin when full?

84%

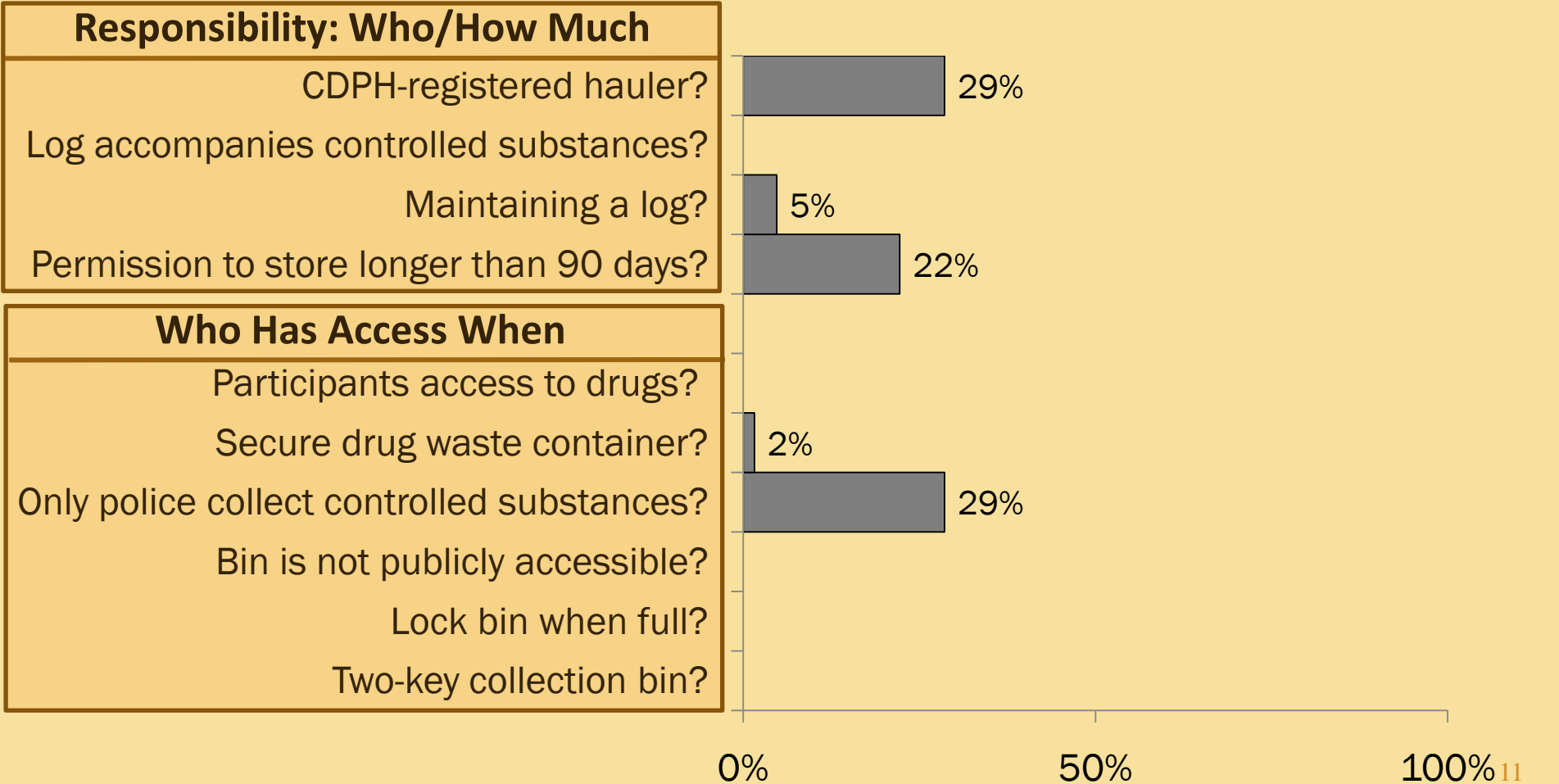
Two-key collection bin?

93%

0% 20% 40% 60% 80% 100% 10

EVALUATION – SAFETY (LAW ENFORCEMENT)

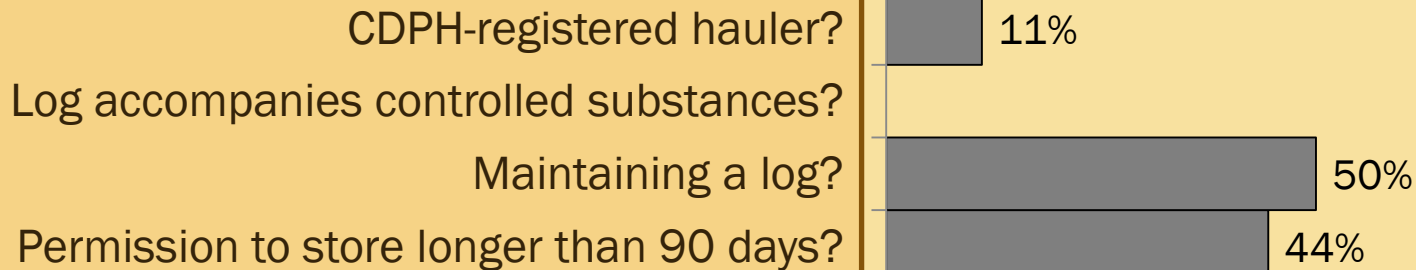
✖ % of Non-Model Law Enforcement per Criterion



EVALUATION – SAFETY (HHW)

✘ % of Non-Model HHWs per Criterion

Responsibility: Who/How Much



Who Has Access When

Participants access to drugs?
Secure drug waste container?
Only police collect controlled substances?
Bin is not publicly accessible?
Lock bin when full?
Two-key collection bin?

0%

50%

100%¹²

EVALUATION – SAFETY (EVENTS)

✗ % of Non-Model Events per Criterion

Responsibility: Who/How Much

CDPH-registered hauler? 9%

Log accompanies controlled substances?

Maintaining a log? 46%

Permission to store longer than 90 days?

Who Has Access When

Participants access to drugs? 15%

Secure drug waste container?

Only police collect controlled substances?

Bin is not publicly accessible?

Lock bin when full?

Two-key collection bin?

0%

50%

100%¹³

EVALUATION – SAFETY (MAIL-BACK)

✗ % of Non-Model Mail-Back per Criterion

Responsibility: Who/How Much

CDPH-registered hauler?

Log accompanies controlled substances?

Maintaining a log?

Permission to store longer than 90 days?

Who Has Access When

Participants access to drugs?

Secure drug waste container?

Only police collect controlled substances?

Bin is not publicly accessible?

Lock bin when full?

Two-key collection bin?

0%

50%

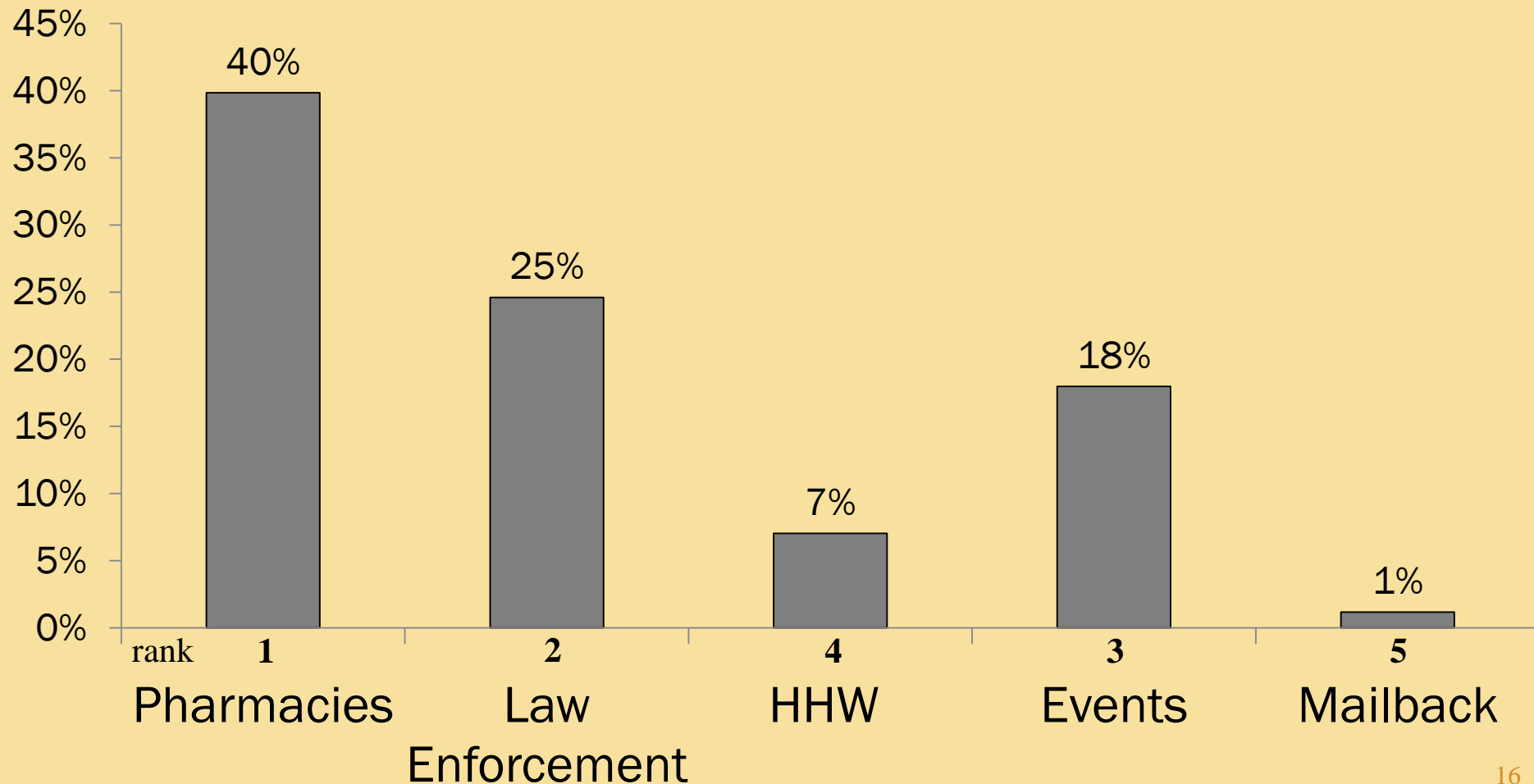
100%¹⁴

EVALUATION CRITERIA

- × Safety
- × Accessibility
- × Cost Effectiveness
- × Efficacy

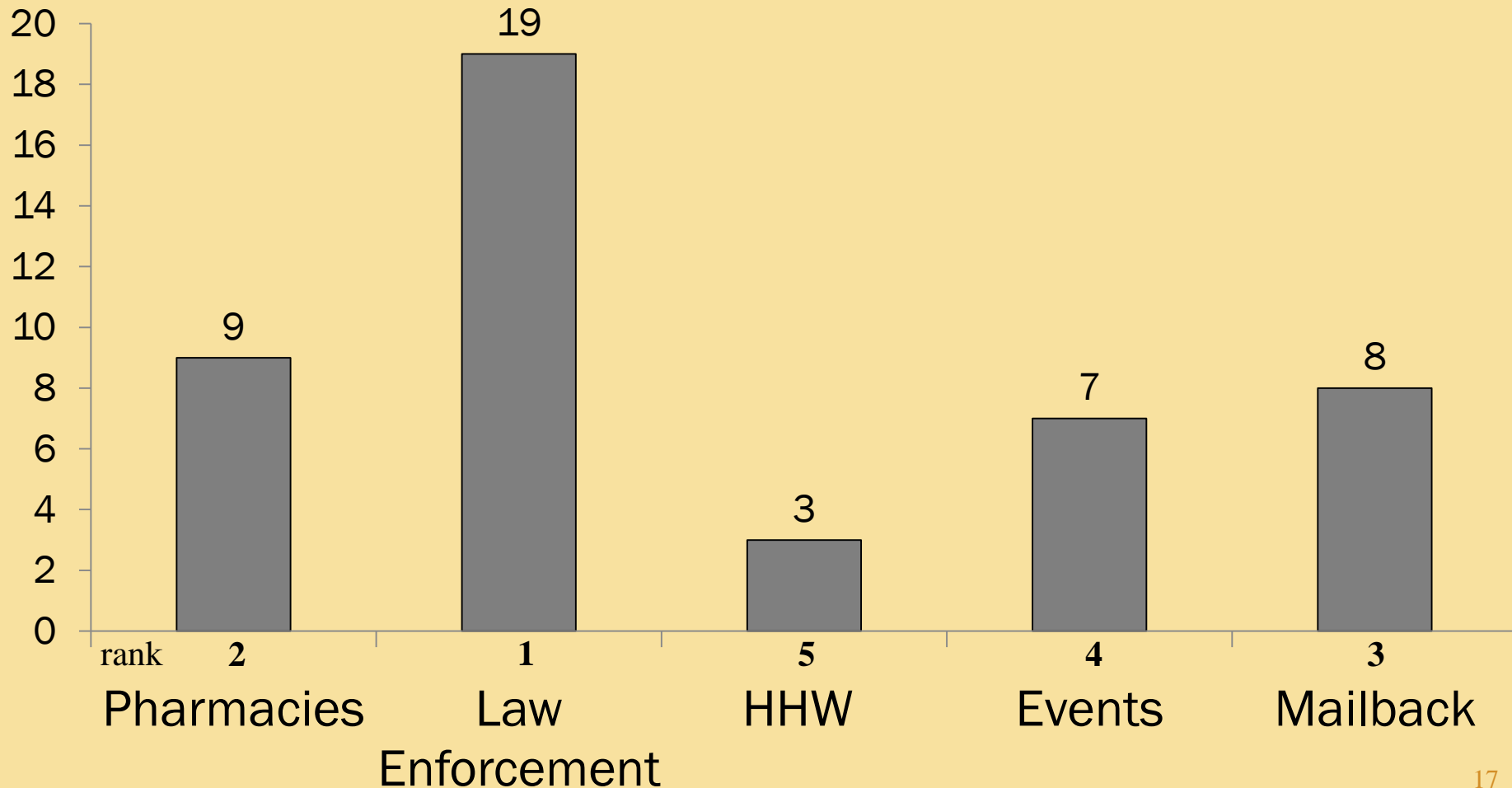
EVALUATION – ACCESSIBILITY

✕ Number of program sites (% of total)



EVALUATION – ACCESSIBILITY

✕ Average Number of Access Hours per Day

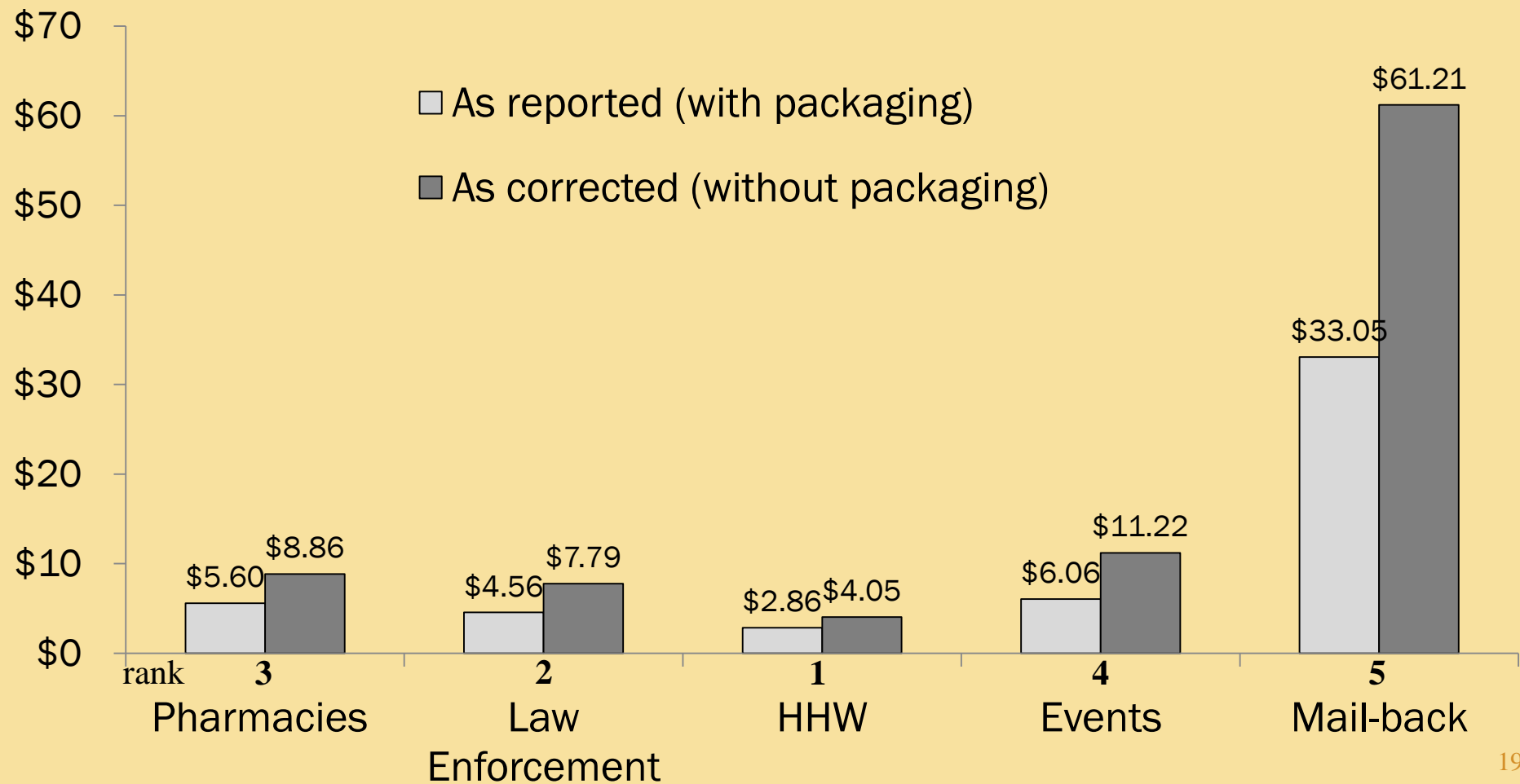


EVALUATION CRITERIA

- × Safety
- × Accessibility
- × **Cost Effectiveness**
- × Efficacy

EVALUATION – COST EFFECTIVENESS

✕ Average Cost per Pound

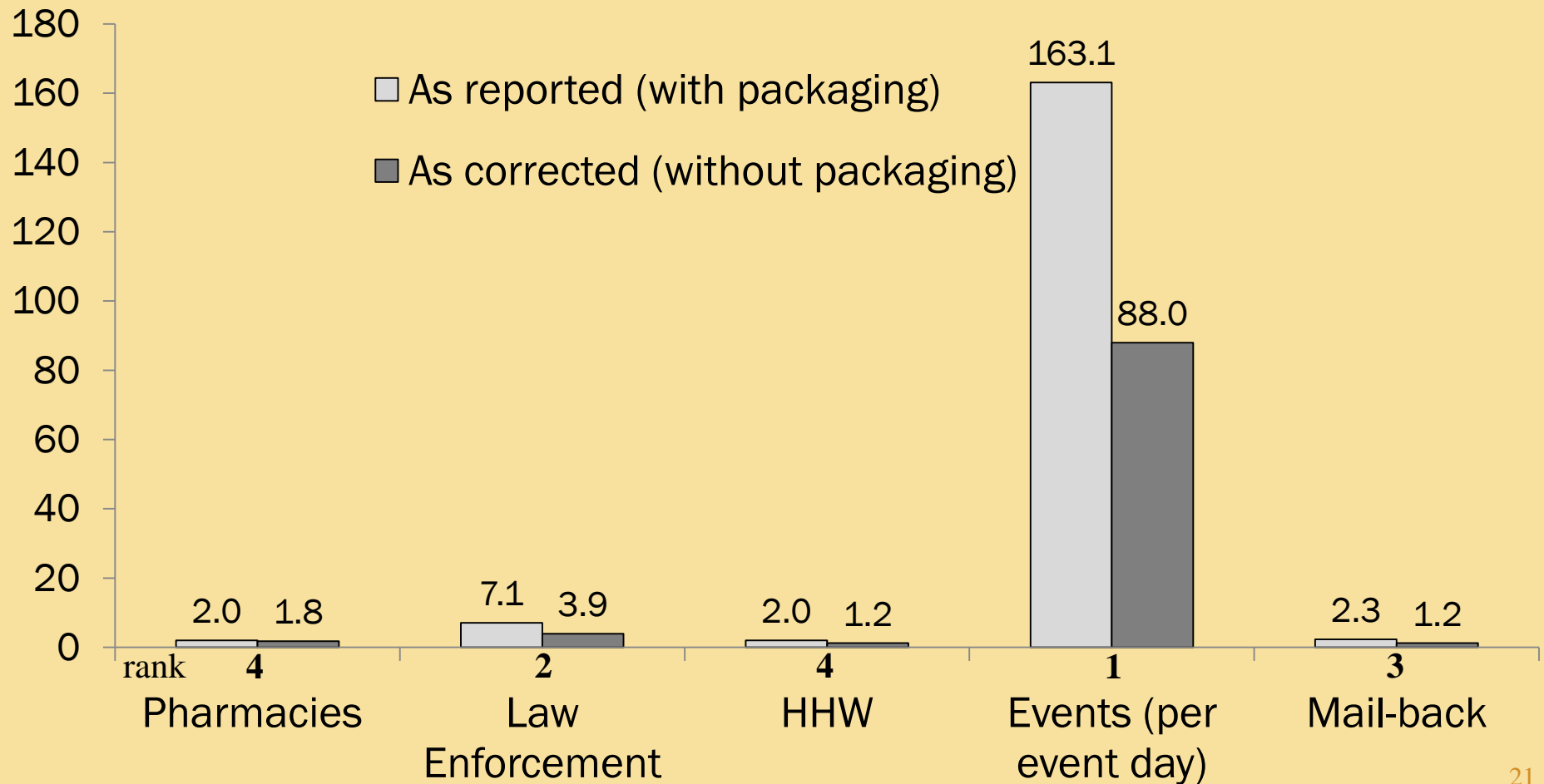


EVALUATION CRITERIA

- × Safety
- × Accessibility
- × Cost Effectiveness
- × **Efficacy**

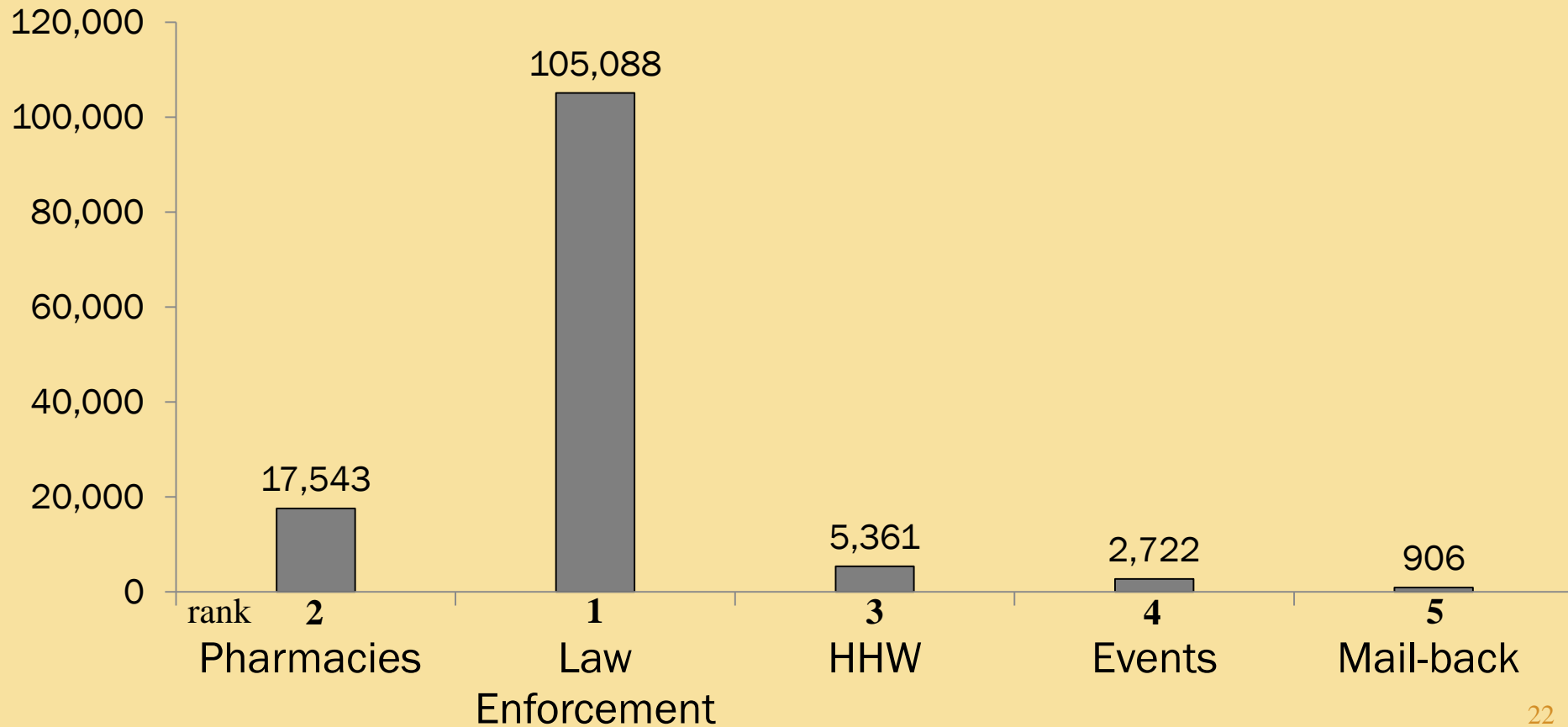
EVALUATION – EFFICACY

✕ Average Pounds Collected per Day of Operation



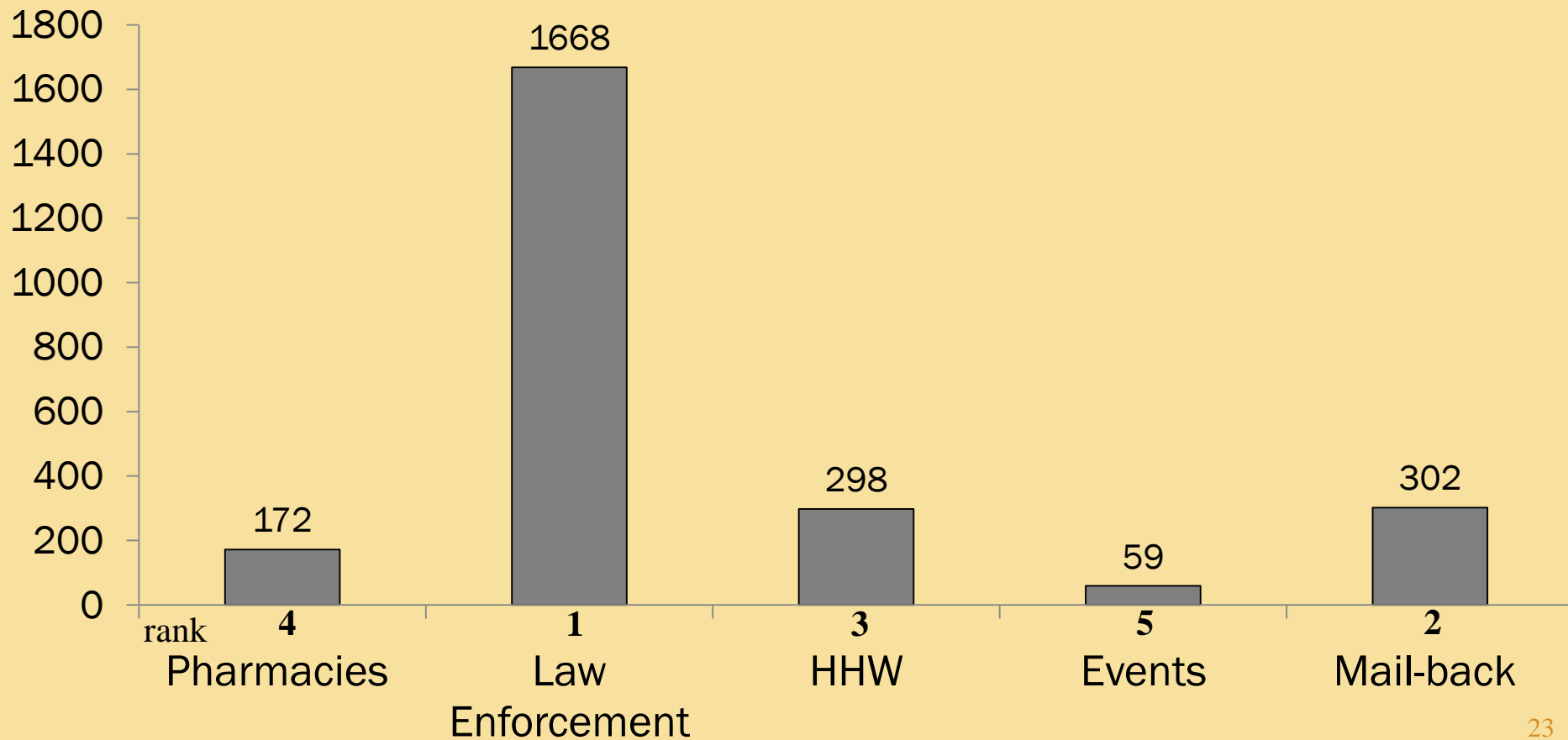
EVALUATION – EFFICACY

✕ Total Pounds Collected by Program Type
without packaging (July 1, 2009 to March 1, 2010)



EVALUATION – EFFICACY

✕ Average Pounds Collected per Program
(as corrected)



SUMMARY RANKINGS

✖ Total of Rankings (out of 11 to 55 possible)



CHALLENGES AND BARRIERS

- ✗ Safe programs are expensive
- ✗ Public Awareness and Participation
- ✗ Sustainable Funding
- ✗ Goals
- ✗ Complexity of Requirements

CHALLENGES AND BARRIERS

- ✗ Safe programs are expensive
 - + Controlled substances
 - + Registered waste haulers
 - + Disposal facility options
 - + Two-key collection bins
 - + Secure containers
 - + Records and data

CHALLENGES AND BARRIERS

- ✗ Public Awareness and Participation
- ✗ Sustainable Funding
- ✗ Goals
- ✗ Complexity of Requirements
 - + DEA
 - + Board of Pharmacy
 - + DTSC
 - + CDPH

OVERVIEW

- × Survey Results Evaluation
- × Challenges and Barriers
- × Other Programs
- × Options

INTERNATIONAL PROGRAMS

	Collection Point	Program Management & Funding		
	Pharmacies	Gov't	Private sector	Private sector + gov't
Number of programs	9*	1	6	2

* Some programs in Canada also use collection/HHW depots, 2 programs only use HHW depots.

FEDERAL & STATE

× Federal

- + Controlled Substances Act
- + White House ONDCP: guidelines for consumers



× State

- + Pilots:
 - × IA, CO, ME, WA
 - × At pharmacy, mail-back, or combo
 - × Multiple funding sources (public & private sector)

POTENTIAL OPTIONS

- ✗ *Option 1. Continue Current Practices*
- ✗ *Option 2. Improve Guidelines & Regulation*
- ✗ *Option 3. Implement Product Stewardship*
- ✗ *Option 4. Use Advanced Disposal Fee and State Oversight*

OPTION 1. CONTINUE CURRENT PRACTICES

- ✗ California Guidelines remain optional
- ✗ National Drug Control Policy Guidelines
- ✗ Funding: Taxpayers  local government
 service providers



OPTION 1. IMPACTS

- ✖ Safety: ↔ some continued illegal diversion
- ✖ Accessibility: ↔ many consumers unaware
- ✖ Cost effectiveness: ↔ same level of costs
- ✖ Efficacy: ↔ no significant increase in collection
- ✖ Collection cost: ↔ high cost continues

OPTION 1. IMPACTS

- ✖ Awareness: ↔ remains inadequate
- ✖ Sustainable funding: ↔ remains an issue
- ✖ Goals: ✖ still no goals
- ✖ Complexity of Requirements: ✖ still not addressed
- ✖ Environmental impacts: ↔ significant

OPTION 2. IMPROVE GUIDELINES & REGULATION

- ✗ Legislature directs a state agency to develop regulations
- ✗ State agency develops regulations based on California Guidelines
- ✗ Funding: Taxpayers  local government
 service providers

OPTION 2. IMPACTS

- ✗ Safety: ↑ improves with more model programs
- ✗ Accessibility: ↓↑ initially drops, ultimately may improve with more programs
- ✗ Cost effectiveness: ✗ higher costs*
- ✗ Efficacy: ↑ some improvement in collection
- ✗ Collection cost: ✗ higher costs - practices mandated

* Costs may decrease with more flexibility in guidelines

OPTION 2. IMPACTS

- ✗ Awareness: ↔ remains inadequate
- ✗ Sustainable funding: ✗ more challenging, higher costs
- ✗ Goals: ✗ no goals
- ✗ Complexity of Requirements ✓ provided
- ✗ Environmental impacts: ↔ significant

OPTION 3. PRODUCT STEWARDSHIP

- ✗ **Legislature:**

- + directs producers to establish programs
- + assigns state agency roles
 - ✗ Collection goals set in statute or plans

- ✗ **Producers plan and operate programs**

- ✗ **State agency provides regulatory oversight**

- ✗ **Funding:**





OPTION 3. IMPACTS

- ✗ Safety: ↑ improves with more programs
- ✗ Accessibility: ↑ improves with more programs
- ✗ Cost effectiveness: ↑ improves with private sector innovations
- ✗ Efficacy: ↑ collection increases
- ✗ Collection cost: ↓ lower costs - flexibility

OPTION 3. IMPACTS

- × Awareness: ↑ increases
- × Sustainable funding: ✓ addressed
- × Goals: ✓ established
- × Complexity of Requirements: ✓ provided
- × Environmental impacts: ↓ less waste in environment

OPTION 4. ADVANCED DISPOSAL FEE

- ✗ Legislature authorizes statewide program
- ✗ State Govt: creates regulations, receives fees from consumers, pays service providers, oversees compliance and enforcement.
- ✗ Funding: consumers  state government
 service providers

OPTION 4. IMPACTS

- ✗ Safety: ↑ improves with more programs, better coordination
- ✗ Accessibility: ↑ improves with more programs
- ✗ Cost effectiveness: ✗ lower without incentive to innovate
- ✗ Efficacy: ↑ collection improves
- ✗ Collection cost: ✗ subsidized costs, disincentive to innovate

OPTION 4. IMPACTS

- × Awareness: ↑ improves
- × Sustainable funding: ✓ addressed
- × Goals: ✓ likely established
- × Complexity of Requirements: ✓ provided
- × Environmental impacts: ↓ less waste in environment

PARTING THOUGHTS....



- ✘ Consensus: illegal diversion is a big concern
- ✘ Options are starting point for discussion
- ✘ Legislation would be needed for options, except the status quo
- ✘ Your expertise, advice and comments are welcome,
- ✘ And...

✘ Written comments are due

August 13, 2010

✘ Send to: PharmaSharps@CalRecycle.ca.gov

Comments

